

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**CREDITORS' COMMITTEE'S URGENT MOTION FOR LEAVE TO EXCEED PAGE
LIMITS IN ITS OMNIBUS REPLY TO OBJECTIONS AND RESPONSES TO
CREDITORS' COMMITTEE'S RENEWED BANKRUPTCY RULE 2004 MOTION**

To the Honorable United States Magistrate Judge Judith G. Dein:

The Official Committee of Unsecured Creditors of all title III debtors (other than COFINA) (the "Committee") respectfully submits this *Urgent Motion for Leave to Exceed Page Limits in its Omnibus Reply to Objections and Responses to Creditors' Committee's Renewed Bankruptcy Rule 2004 Motion* (the "Urgent Motion"), requesting entry of an order, substantially in the form of Exhibit A, allowing it to exceed the fifteen page limit set forth in the *Fourth Amended Case Management Procedures* [Docket No. 2839] (the "Case Management Procedures"), by filing one omnibus reply addressing all objections and responses (the "Objections") to its *Renewed Motion Seeking Entry Of Order, Under Bankruptcy Rule 2004*,

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Authorizing Discovery With Respect To Certain Causes Of Puerto Rico Financial Crisis

Beginning On August 15, 2018 [Docket No. 3066] (the “Renewed Motion”).² The reply filed by the Committee on May 30, 2018 will address all five of the Objections (which themselves contain 37 pages of briefing) **and will not exceed twenty (20) pages.**

JURISDICTION AND VENUE

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a).

2. Venue is proper pursuant to PROMESA section 307(a).

BASIS FOR RELIEF REQUESTED

3. On May 15, 2018, the Committee filed its Renewed Motion. On May 22 and 23, 2018, five (5) separate Objections [Dkt. Nos. 3117, 3119, 3120, 3125, and 3128] were filed in connection with the Renewed Motion. The combined briefing on the five Objections totaled approximately thirty-seven (37) pages.

4. Pursuant to paragraph III.K of the Case Management Procedures, the Committee’s reply is due seven calendar days before the June 6, 2018 Omnibus Hearing, or no later than May 30, 2018, at 4:00 p.m. (Atlantic Standard Time). Pursuant to paragraph I.E of the Case Management Procedures, memoranda of law in support of replies are limited to fifteen (15) pages in length.

5. Rather than submitting five separate replies (one for each Objection), in the interest of efficiency and for the convenience of the Court the Committee intends to submit a **single** Omnibus Reply jointly addressing all five (5) Objections.

² The version of the Renewed Motion filed at Docket No. 3066 was partially redacted. A full, unredacted version of the Renewed Motion was filed under seal at Docket No. 3101.

6. Given the number and length of the Objections that are to be addressed in the Omnibus Reply, as well as the various arguments presented by the Objections, the Committee will be unable to meet the fifteen (15) page limit set forth in the Case Management Procedures.

7. Accordingly, the Committee seeks to file a single, coordinated Omnibus Reply that will not exceed twenty (20) pages in length, exclusive of the cover page, table of contents, table of authorities, signature page, exhibits, and the certificate of service.

8. The Committee submits that the request made herein is reasonable in light of the circumstances described above.

9. The Committee also certifies that there is a true need for urgent relief and that such urgency was not created through any lack of diligence.

NO PRIOR REQUEST

10. No previous request for the relief sought herein has been made by the Committee to this or any other court.

CONCLUSION

11. For the reasons stated above, the Committee requests that the Court grant the Urgent Motion and allow the Committee to file a single Omnibus Reply in support of the Renewed Motion not to exceed twenty (20) pages in length.

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Dated: May 29, 2018

/s/ Luc A. Despins, Esq.

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